

BellSouth FACILITIES PROBLEMS

May 1997

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EXHIBIT "I"

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Customer	PON	ASR Date	ASR Due Date	ASR Count	Original FOC Date	Actual Migration Date	Remarks
Customer A	N005750	*4/18/97	06/02/97	4	05/06/97	06/12/97	o BellSouth notified Sprint facilities were not available.
		*Supplemental ASR submitted on 4/29/97 changing due date to 6/12/97.					
							o Because of the facility problem the due date was changed to 6/16/97.
							o The customer did not accept the due date change and the due date was changed to 6/12/97.
							o Migration of the customer was completed on 6/12/97.
Customer B	N000255	*4/18/97			04/29/97	05/06/97	o The BellSouth technician either did not terminate circuit at the demarcation or did not tag the circuit.
		*Supplemental ASR submitted on 4/18/97 changing due date to 5/2/					Neither Sprint nor the customer could locate the circuit.

Customer	Customer PON	ASR in BSL	ROC Received	Number of Lines Migrated From ASL to ROC	Original SAPB	ASL Migration Complete	Remarks
Customer B (Continued)							o On 5/4/97, BellSouth disconnected customer's Service. The disconnect should not have been worked until the scheduled migration date of 5/6. BellSouth restored customer's service.
							o On 5/5/97, Sprint discovered all of the customer's lines were not completely restored and the hunt group was not functioning. Sprint notified BellSouth of the problems. BellSouth corrected the problems which were caused by the early disconnect of the customer's service by BellSouth prior to the 5/6/97 migration date.
							o Customer migration was completed on 5/6/97.

BellSouth FACILITIES PROBLEMS

June 1997

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Customer	Customer PON	ASR Date	FOC Date	Number of Firm Order Confirmation FOCs	Original Date	Actual Date	Remarks
Customer A	Park.DS01	*6/20/97	06/27/97	8	06/30/97	07/10/97	6/26/97 - The original due date
	Park.DS03	**6/20/97	06/27/97	8	06/30/97	07/10/97	was changed to 7/7/97. The
							change in due date was caused
		*ASR was supplemented on 7/01/97 to change due date to 7/07/97.					when Sprint had to send
		ASR was supplemented on 7/03/97 to change due date to 7/10/97.					BellSouth a Supplemental
							Carrier Facility Assignment (CFA)
		**ASR was supplemented on 7/03/97 to change the due date to 7/10/97.					because Sprint's assignment on
							the original CFA was incorrect.
							Also, the due date was changed
							because BellSouth could not
							complete the engineering in
							time for the original due date.
							Sprint contacted customer
							- customer agreed to change.

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Customer	Customer ID	Problem	Resolution	Resolution Date	Resolution Time	Resolution Status	Resolution Comments
Customer A (Continued)							o 7/3/97 - Because of BellSouth's facility problem, the due date was changed again to 7/10/97.
							o 7/8/97 - 8:00 a.m. - customer called Sprint to report their number was out-of-service, callers were receiving a "disconnected" recording.
							Sprint reported the problem to BellSouth's Unbundled Network Element (UNE) Center.
Customer B							o 7/8/97 - BellSouth disconnected customer prior to the scheduled migration date of 7/10/97. BellSouth restored the customer's service.
	Park DS02	6/20/97	08/27/97	6	06/20/97	07/10/97	o 7/10/97 - Due to a BellSouth facility problem, due date was changed from 6/20/97 to 7/10/97.
							o 7/3/97 - Because of BellSouth's facility problem, the due date was changed again, to 7/10/97.
							o 7/8/97 - BellSouth disconnected the Customer in error, this was done prior to the scheduled migration of 7/10. BellSouth reconnected the customer.

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BellSouth FACILITIES PROBLEMS

(FOC = Firm Order Confirmation)
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[illegible]

BellSouth FACILITIES PROBLEMS **August 1997**

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(FOC = Firm Order Confirmation)
 (ASR = Access Service Request)
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Customer	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR to FOC	Original Order Date	Actual Completion Date	Remarks
Customer A	N008867	08/06/97	08/07/97		08/11/97	08/12/97	o 8/6/97 - ASR to BellSouth.
							o 8/7/97 - FOC received from BellSouth.
							o 8/11/97 - BellSouth ready to test five lines, but not on two. BellSouth will continue to work on the lines.
							o BellSouth requested the due date changed in order to avoid jeopardy.
							o Customer migrated on 8/12/97
Customer B	N008866	08/01/97	08/18/97	01/17/00	08/12/97	08/15/97	o 8/1 /97 - ASR to BellSouth.
							o 8/4/97 - Sprint supplemented the ASR in order to add signaling.
							o 8/7/97 - No FOC

Customer	Customer PON	ASR To BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDO	Actual Migration Complete	Remarks
							o 8/8/97 - Sprint's Business Consultant called Diane Salters, BellSouth. Salters stated that the facilities were not available and new facilities would not be available until 9/4/97.
							o Mildred Graham, Sprint Manager, spoke with BellSouth about the facility problem. A decision was made to change the due date to 8/13/97 because of the facility problem.
							o 8/12/97 - BellSouth contacted Sprint stating that they (BellSouth) were trying to meet the 8/13/97 due date, but most likely the migration would be completed by noon on 8/14/97.
							o 8/12/97 - BellSouth discovered a cable problem and notified Sprint, also a utility permit was required. Facility permits require a 48 hour notice, but an expedite would be requested. The due date was changed to 8/18/97 due to BellSouth's facility delay.
							o 8/13/97 - Received an FOC changing the due date to 8/18/97.
							o 8/15/97 - Customer migration completed.

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September 1997

(PON = Purchase Order Number)

Customer	Customer Name	ASR to Bell	FOC Received	Number of Days of Notification to ASR to FOC	Order Closed	Actual Migration Complete	Remarks
Customer A	OTC.ds1	09/26/97			09/29/97	10/01/97	o An ASR was submitted to BellSouth on 9/26/97. This request was for a T1/access service. o BellSouth and Sprint participated in a conference call. BellSouth stated their policy regarding any access request which was sent through their ICSC Department, received 0-4 days prior to the migration date would not have an FOC issued, but BellSouth would commit to expediting and processing the order the day the order was received. Also, BellSouth committed to notification of Sprint 24 hours prior to the migration date of any facility problems or unavailability.

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Customer	Customer Name	Access Order No.	FOC Weeks	Number of Business Days from Access No.	Original Migration ODD	Actual Migration Complete	Remarks
Customer A (Cont..)							o FOC was not received, because of BellSouth's policy on access orders.
							o 9/29/97 - BellSouth failed to notify Sprint of facility problems until the date of migration (9/29/97). BellSouth did not give an estimated date the facilities would be be available.
							Sprint notified BellSouth several times prior to 9/29/97 to verify if facilities were available. Sprint was not notified of the facility problem until the day of migration.
							o BellSouth failed in their commitment to notify Sprint 24 hours prior to customer migration of facility problems.
							o The customer migrated on 10/1/97. This was two days after the original customer desired due date.

EXHIBIT “J”

EXHIBIT "J"

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Melissa Cloez
Director-Local Market Development

Local Market Integration
c/o Sprint Home State Bank
Madison, TN 37111
Voice: 615-875-1111
Fax: 615-875-1111
mcloez@home.statebank.com

May 19, 1997

Ms. Carol Jarman
Director- Sprint Account Team
BellSouth Interconnection Services
Suite 440
Two Chase Corporate Drive
Birmingham, AL 35244

Dear Carol:

Thank you for your May 2 letter following up on the status of the "DACS-mapped integrated SLC" provisioning issue which has delayed the installation of several Sprint Metropolitan Networks (SMNI) customer orders. My response is for the purpose of providing clarification as to what the issue is and why its resolution is critical.

SMNI has placed unbundled loop service orders with BellSouth for several customers where the customer is currently provisioned by BellSouth utilizing a DACS-mapped integrated SLC-- essentially a "pair gain" device employed by BellSouth to maximize facility utilization. In attempting to provision unbundled loops for SMNI, BellSouth discovered that its systems and procedures did not support re-use of the existing facilities. Further, BellSouth did not have additional facilities available to turn up the unbundled loops ordered by SMNI. BellSouth then chose not to construct additional facilities in lieu of resolving the underlying systems and procedural issues in order to turn up the unbundled loops for SMNI. The result is that of the three service orders referenced in my 4/18 letter, two SMNI service installations were significantly delayed. The third installation was completed without the use of the SLC.

We have been advised by BellSouth personnel that these installations were completed for testing purposes only and that no additional installations of this type will be completed until BellSouth's procedural issues have been resolved. Moreover, we have been told that DACS-mapped integrated SLC provisioning configurations are widely-deployed throughout BellSouth meaning that SMNI will likely continue to encounter customers whose provisioning raises the same issues.

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Sprint appreciates BellSouth's desire to seek long term systems and process solutions for provisioning these services. However, our request is that future unbundled loop orders under this provisioning scenario be installed utilizing whatever interim procedures are necessary to complete the service order installations within mutually established intervals. This will enable BellSouth and Sprint to make progress toward our mutual goal of on-time service installations.

Carol, we would appreciate BellSouth's response to the request outlined above by Friday, May 30. Thanks again for your update, and I look forward to your response.

Sincerely,



Melissa L. Closs

Director - Local Market Development

cc: George Head- Sprint
Richard Warner- Sprint
Joe Baker- BellSouth

EXHIBIT “K”

EXHIBIT "K"

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AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ORANGE)

I, Julia Downs, based on information and belief, state and allege the following:

I am the Director of Human Resources and Administration for WMFE, Channel 24, the public television station for Orlando, and 90.7 on the FM dial, the public radio station. WMFE has 12 PBX trunk lines and 32 "B1" business lines, including one fifteen line rotary group, one three line rotary group and 14 private lines. During the summer of 1996 we were approached by Sprint Metropolitan about the possibility of switching our local telephone service from Southern Bell. We made the decision to switch because of the substantial savings we could receive by switching to SMNI. We also believed that switching from Southern Bell to SMNI would be transparent to us at WMFE and to those calling WMFE.

Our original cutover date from Southern Bell was scheduled for October 17, 1996. I was scheduled to be out of town October 18, so I requested that we postpone the cutover in case there were any problems. The rescheduled cutover date was November 7, 1996, however, for some unknown reason BellSouth disconnected all service to WMFE during the early morning hours on October 22, 1997. It took three days to get service totally restored to WMFE with the work being completed one day before the commencement of our radio membership drive, which is totally dependent on telephone calls to generate revenue.

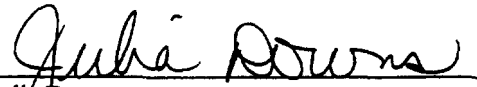
During the rescheduled cutover only 13 of the lines could be cutover because of technical problems on BellSouth's end. This resulted in a second cutover date of November 13, 1996. On that date BellSouth had a service technician and a supervisor on site to assist with the cutover. Both were professional and efficient in working with me and with SMNI, and we were able to cutover the remaining 30 lines.

In addition our telephone number was temporarily eliminated from BellSouth's directory assistance. We discovered this quite accidentally, when a caller pointed this out to us.


There were times when I thought maybe we should go back to BellSouth, but I just don't want to reward them for what I believe to be unexplained and inexcusable behavior. It's a matter of principle.

Attached to my affidavit is a memo I wrote to our President, Steve Steck, when I was asked to explain the problems we had been having with our telephone system. I also have attached a letter he wrote to Thomas Hunt, of BellSouth concerning the problems we experienced.

Further affiant sayeth naught.


Julia Downs

Subscribed and sworn before me this 1 day of October, 1997.


Notary Public

My Commission Expires on 7/12/2001.



Susan J. Akomer
MY COMMISSION # CC634420 EXPIRES
July 12, 2001
BONDED THRU TROY FAIR INSURANCE, INC.

EXHIBIT "K"

Page 2 of 4



WMFE-TV/FM
11510 E. COLONIAL DRIVE
ORLANDO, FLORIDA 32817-4699
(407) 273-2300

Mr. Thomas E. Hunt
Regional Director
BellSouth
500 North Orange Avenue, Ste 568
Orlando, Florida 32801

Dear Tom:

December 3, 1996

Recently we experienced some exasperating moments with BellSouth. I thought you ought to know about it.

I have enclosed a copy of a memorandum from WMFE's Director of Administration, Julia Downs. She itemizes the difficulties she and WMFE experienced with BellSouth.

Surely, the instances she describes are not behaviors or procedures you condone. After your reflection on her comments, I would appreciate your thoughtful response.

By the way, before we switched from BellSouth to Sprint, we asked if BellSouth would care to negotiate in some manner to keep our business. BellSouth declined.

Best Holiday Wishes,

A handwritten signature in cursive script that reads 'Steve'.

Stephen McKenney Steck
President and Chief Executive Officer

SMS/dms
[letters]120396.doc
Enclosure

c: Julia Downs

EXHIBIT "K"

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MEMORANDUM

TO: Steve Steck
FROM: Julia Downs *JD*
SUBJECT: Telephone Service
DATE: November 22, 1996

This memo is in response to your questions and concerns about our telephone service.

As you know, we recently elected to change from Bell South to Sprint Metropolitan as the provider of our local network service. We made this decision based on the substantial savings to WMFE (approximately \$8,000 annually), and because the change would be transparent to us here at WMFE and to those calling WMFE. However, several things have happened that made that change *painfully* obvious.

First, the cutover was tentatively scheduled for October 17. Because I was going to be out of town beginning October 18, we decided to postpone the cutover, just in case there were any problems. Bell South was notified of this postponement. However, for some reason unknown to anyone, Bell South disconnected all service to WMFE during the early morning hours of October 22. It took three days to get service totally restored to WMFE, the work being completed just one day before the start of our Radio Membership Drive, which is totally dependent on telephone calls to generate revenue.

Second, our cutover was scheduled for November 7. Of the 43 lines that needed to be cutover, they could only complete 13 of them because of technical problems on Bell South's end. This caused us to have to schedule another cutover date on November 13. On that date, Bell South had a service technician and supervisor on site to assist with the cutover. They were both professional and efficient in working with me and Sprint United, and the remaining 30 lines were cutover at that time.

Third, Bell South terminated all of WMFE's long distance calling cards. We did not request that and it should not have been a part of the service disconnection. You, of course, were stranded out of town without a long distance calling card.

EXHIBIT "K"

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Memorandum to Stephen McKenney Steck

November 21, 1996

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And **fourth**, our telephone number was temporarily eliminated from Bell South's directory assistance, which was an error on their part. We discovered this when a caller pointed it out to us.

I would like to point out that while this is a new process for the telephone companies; in my opinion there were too many unexplainable accidents on Bell South's part.

I hope this gives you a good synopsis of the problems we encountered during this process. Please let me know if you have any additional questions.

jd

EXHIBIT “L”

EXHIBIT "L"

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George V. Head
Vice President
Local Market Integration
7301 College Blvd.
Overland Park KS 66210
KSOPKV0104
Phone: 913-534-6102
Fax: 913-534-6237

June 18, 1997

Mr. Joseph M. Baker
Vice President - Sales
BellSouth Telecommunications, Inc.
Interconnection Services
675 West Peachtree Street, N. E.
Suite 443
Atlanta, Georgia 30375

Dear Joe:

I am writing to again express serious concern regarding recent service problems in Orlando, Florida, and to request BellSouth's review and analysis of the situation in our meeting in Birmingham on June 24th. As you know, our teams have met many times to discuss service related difficulties being encountered by Sprint Metropolitan Networks, Inc. (SMNI), and yet they continue to occur.

During a three week period from May 19 to June 6, 1997, SMNI's customers encountered three significant service interruptions related to receiving calls through the BellSouth network. In each case, Sprint's customers could receive calls directly to their Sprint numbers but calls being call-forwarded through the BellSouth network could not be completed.

In the first occurrence, an "all circuits busy" condition was created on Monday morning, May 19, when interoffice traffic was reversed in error by Bell South in conjunction with trunk additions BellSouth was installing. Customers were impacted for 3 hours and over 20 trouble tickets were received.

EXHIBIT "L"

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The second incident, on May 30, revealed a translations problem in a BellSouth local switch whereby calls processed via the primary route were completed but the secondary route returned "no longer in service" or "can't be completed as dialed" messages. This service problem occurred for at least seven hours before it could be isolated and resolved by BellSouth.

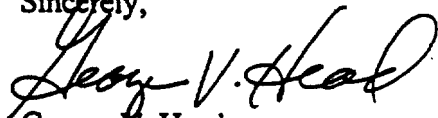
Most recently, on June 6, a simulated facilities group was removed from translations in error by BellSouth, again resulting in calls to SMNI customers being blocked for over two hours.

Attached for your review are the outage reports provided to Sprint by your account team after the first and third event. Each describes "human error" occurring in the translations support team. The second event, for which Sprint did not request a written report, occurred on May 31, 1997 and was also attributed to a translations error.

These errors by BellSouth have resulted in service deficiencies that have damaged Sprint's relationships with its end user customers and are impeding Sprint's ability to establish itself as a local service competitor in Central Florida. Even more disturbing is that these events occurred during a timeframe within which Sprint had requested, and BellSouth had agreed, to provide measurable and specific improvements in the service it provides to SMNI.

I look forward to seeing you and the BellSouth team on the 24th in Birmingham. I trust that BellSouth will have identified the irreversible corrective action on its translations process.

Sincerely,



George V. Head

cc: Melissa Closz - Sprint
Carol Jarman - Bell South

EXHIBIT "L"



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BellSouth Interconnection Services**Memorandum**

Date May 21, 1997

To Linda McGrupe
Jerry Johnson

From Gretchen Wilson
Telephone Number 205 988-1879
Fax Number 205 988-7003

Subject Sprint Metro Net routing problems

Linda:

Per your request, following are details relative to the traffic overflow problem in Orlando -

The problem occurred during the provisioning of the new IT groups. The routing in the Colonial Main and Tandem office was reversed on the turn up of the new group. The traffic was rerouted through the tandem and most of the overflows cleared. We had several conversations with Steve(Sprint Metro Net) to verify he was seeing the traffic. He indicated that he was still seeing some overflows. The ACAC verified all of Sprint Metro Net's NNXs in the nine offices where we established direct trunk groups. We found overflow routing problems in 4 offices. The ACAC obtained copies of the routing requests and proceeded to get the traffic rerouted, one office at a time, to insure that we did not cause Sprint Metro Net any additional problems

To keep this same problem from reoccurring a copy of the routing request will be sent to the project manager to be included in the package for switched access. A copy of this same routing request will be provided to the switched access supervisor to be retained for the maintenance group. Switched access will verify the routing upon turn-up of any new IT group.

EXHIBIT "L"

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The SFG was successfully restored at approximately 6:15 PM EDT and the blocking of the existing Sprint Metro customers was cleared at that time.

Because the SFG had been removed, the original project for Mid Florida Pools had to be rebuilt and flowed back through the switch. This was accomplished by 7:00 PM EDT.

The following steps are being taken to guard against a recurrence of the problem discussed above:

1. Prepare and send a memo to NISC /RCMAG Directors by Friday, June 13th, to contain:
 - A. Account of the CLEC trunk outage in the Orlando Magnolia Central Office which occurred on June 6, 1997.
 - B. Require mandatory coverage for all CTG electronic technicians on Translation Bulletin No. 97-TB-46, issued May 23, 1997 and provide positive report to staff by June 20, 1997.
2. Re-transmit the Translation Bulletin 97-TB-46 to all NISC personnel by Friday, June 13th.
3. On June 11th, 1997, a second SFG was built in the 1AESS switch in the Orlando Magnolia Central Office to establish a hunt group arrangement that will provide "overflow" for CLEC trunk access.
4. Develop and deliver a package for quick restoral of the SFG in case of future outage to the RCMAG by June 20th, 1997.

We trust that the above information satisfies your request regarding the outage in the Orlando Magnolia Central Office. If you should have additional questions or concerns surrounding the outage, please let me know.



cc: Joe Baker
Richard Warner

EXHIBIT "L"

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BellSouth Interconnection Services
Suite 440
Two Chase Corporate Drive
Birmingham, Alabama 35244

Fax 205 988-1688
205 988-1700

Carol E. Jarman
Sales Assistant Vice President
Sprint Account Team

June 12, 1997

Melissa Closz
Director
Local Market Development
Sprint
151 Southhall Lane #400B
Maitland, Florida 32571

Subject: Sprint Metro Outage In Orlando Magnolia 1AESS

Dear Melissa:

This letter is to provide the details of the service outage to Sprint Metro in the Orlando Magnolia 1AESS office and to outline the steps BellSouth has taken to guard against a recurrence.

On June 4, 1997, BellSouth Project Manager Daryl Ducote received a call from Lori Doherty with Sprint Metro. Lori requested that two telephone numbers be added to a service order providing Remote Call Forwarding (RCF). This could not be done because the service order had been issued to complete on June 3. The Local Carrier Service Center (LCSC) did accept, however, a verbal request from Sprint Metro to place an order for RCF on the two lines. A new (N) service order (NY8FFPY5) was issued on June 6, 1997 at 1:26 PM. This N order was issued to remote call forward telephone numbers 407-481-2376 and 404-843-4817 to 407-206-2106 and 404-206-2105 respectively.

After the N service order was issued, the Service Representative realized that a change (C) service order should have been issued instead. She then canceled the N service order and issued a C service order. The C service order, (CY93T5D1), was issued to provide RCF for these lines. When the canceled N service order was received by the Recent Change Memory Assistance Group (RCMAG), the Line Translation Specialist (LTS) removed the numbers from the translations as well as the associated Simulated Facilities Group (SFG). Removal of the SFG resulted in the blocking of all incoming traffic for Sprint Metro from the RCF numbers in the Orlando Magnolia 1AESS switch.

A trouble report was received at 5:00 PM EDT from Sprint Metro. The Electronic Technician (ET) at the Unbundled Network Element Center (UNEC) called RCMAG to rebuild the SFG.